

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Kevin Smith Thurston

) Case No.: 22-33236-KRH

) Chapter 13

Debtor(s).

REPLY

The Debtor responds, by counsel, to the Motion for Relief from Automatic Stay filed by GT

Remodeling, LLC as follows:

1. ADMIT
2. ADMIT
3. ADMIT
4. ADMIT
5. ADMIT
6. ADMIT
7. NEITHER ADMIT OR DENY
8. NEITHER ADMIT OR DENY
9. NEITHER ADMIT OR DENY
10. ADMIT
11. DENY
12. NEITHER ADMIT OR DENY
13. NEITHER ADMIT OR DENY
14. NEITHER ADMIT OR DENY

Counsel for the Debtor
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15. DENY

16. DENY

17. NEITHER ADMIT OR DENY

18. DENY

19. DENY

20. NEITHER ADMIT OR DENY

DEFENSES

Your Debtor and his counsel are investigating the validity of the foreclosure sale referenced in the Motion. In the event the foreclosure sale is rendered void due to defective service or failure to comply with any other statutory requirements, the schedules and forms as filed would be validated and the Movant's motion would be rendered moot. In the event the foreclosure sale is proven to be valid, your Debtor would assert he is not trespassing, but is rather a tenant at sufferance and would pray that Movant be directed to observe all formalities regarding ejectment proceedings as required by state law.

WHEREFORE, your debtor requests that he be granted a reasonable period of time to investigate the validity of the foreclosure sale and that, if found defective, the Motion be denied. Your debtor further requests that in the event the foreclosure sale is rendered valid, that the movant be directed to observe all formalities regarding ejectment proceedings as required by state law.

/s/ Brett Alexander Zwerdling
Counsel

Certificate of Service

I hereby certify that on December 2, 2022 a true copy of the foregoing was served electronically via CM/ECF upon the U.S. Trustee, the Chapter 13 Trustee, and W.R. Baldwin, III of Meyer Baldwin Long & Moore, LLP, counsel for the Movant: GT Remodeling, LLC.

/s/ Brett Alexander Zwerdling

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